United States Department of the Interior
NATIONAL PARK SERVICE
Air Resources Division
P.O. Box 25287
Denver, CO 80225

IN REPLY REFER TO:

TAKE PRIDE® IN AMERICA

February 7, 2007

N3615 (2350)

Ms. Sheila Holman
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Re: Preliminary Comments and Questions on the Blue Ridge Paper Products, "BART Control Technology Evaluation"

Dear Ms. Holman:

Exemption modeling showed that Blue Ridge Paper Products, Inc. (BRP) had visibility impacts greater than 0.5 deciview (dV) at the Great Smoky Mountains Class I area. BRP submitted a BART demonstration relating to five facilities within the paper mill, along with a paper entitled, "Retrofit Control Technology Assessment for NO_x, SO_2 and PM Emissions From Kraft Pulp and Paper Mill Unit Operations" by the National Council for Air and Stream Improvement, Inc. BRP contends that they already employ the "most stringent controls available" or that physical circumstances and low emission rates make retrofits prohibitively expensive. Thus, BRP requested that no additional control technologies be required to meet BART.

General Comments

On the last page of the Introduction, BRP states: "...the change in modeled visibility impact...is less than the 1 deciview threshold of human perception for changes in visibility...Therefore, BART is no further controls." Further, page 4-3 states, "If the net visibility improvement is less than the humanly perceptible change, then there is no need for the facility to implement the control technologies because the resulting visibility impacts would be negligible." We acknowledge that "visibility improvement that would result from controlling the emissions" is one of the factors in a BART analysis. However, the BART decision should not be based upon perceptibility. Because BRP's position is contrary to EPA Guidance, we ask that BRP show us the basis for this assertion.[1]

[1] EPA states in the preamble to its BART Guidelines that," Even though the visibility improvement from an individual source may not be perceptible, it should still be considered in setting BART because the contribution to haze may be significant relative to other source contributions in the Class I areas. Thus, we

Since there does not appear to be any dispute about the technical feasibility of scrubbing SO_2 from the recovery furnaces and reducing NO_x via improved combustion controls, BRP's cost benefit analyses (in terms of $/ton removed and $/dv visibility improvement) become the focus of our comments.

We have the following comments regarding Table 4-2 which presents a cost/benefit analysis for controlling SO_2 from the recovery furnaces:

- BRP refers to a vendor quote for the scrubber installation--that should be provided.
- While we believe it is legitimate to account for the costs of lost production and make up, we would like to see the actual calculations to support these very large figures.
- BRP refers to a 7/19/06 vendor e-mail for the installation of a new fan and ductwork—that should be provided.
- The reference for the cost of new switch gear installation is missing and should be provided.
- If waste caustic is available from the bleach plant—if there is one—it could be used as the scrubbing reagent, thus reducing reagent and disposal costs—this should be investigated.
- The Capital Recovery Factor is inflated. The OAQPS Control Cost Manual recommends 7% interest over a 15-year life, not the 15% over ten years used by BRP.
- BRP should document the 90% scrubber efficiency assumption—it seems low.

We have the following comments regarding Table 4-4 which presents a cost/benefit analysis for controlling NO_x from the recovery furnaces:

- BRP should provide documentation to support its cost estimates.
- While we believe it is legitimate to account for the costs of lost production and make up, those costs should not be included in the base for estimating Indirect Annual Costs.
- The Capital Recovery Factor is inflated. The OAQPS Control Cost Manual recommends 7% interest over a 15-year life, not the 15% over ten years used by BRP.
- BRP should document the 40% control efficiency assumption.

Basically, we are concerned that BRP may have overestimated costs and underestimated benefits.

---

disagree that the degree of impairment should be contingent upon perceptibility. Failing to consider less-than-perceptible contributions to visibility impairment would ignore the CAA's intent to have BART requirements apply to sources that contribute to, as well as cause, such impairment."

Please feel free to contact Don Shepherd (303-969-2075) of my staff if you have any questions.

Sincerely,

John Bunyak
Chief, Policy, Planning and Permit Review Branch